

FILED

UNITED STATES DISTRICT COURT

for the

Central District of California

Riverside Division

2024 NOV 12 AM 9:49

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
RIVERSIDE

FEE PAID

13 xiaoxia Ding

ED CV

Case No. -

02398

-KK(SA_x)

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

keming Wang

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|------------------------------|
| Name | xiaoxia Ding |
| Street Address | 10423 Bodger St |
| City and County | El Monte, Los Angeles County |
| State and Zip Code | CA 91733 |
| Telephone Number | 5714745878 |
| E-mail Address | selinawhiteusa@gmail.com |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name keming Wang

Job or Title *(if known)* _____

Street Address 8703 Seeker St

City and County Chino , San Bernardino County

State and Zip Code CA 91708

Telephone Number _____

E-mail Address *(if known)* _____

Defendant No. 2

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

Defendant No. 3

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

Defendant No. 4

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1. Torture Victims Protection Act (TVPA)
2. Alien Tort Statute (ATS)
3. First Amendment

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
\$150,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The defendant, Keming Wang, formerly served as the Director of the Department of Urology at Tianjin Third Central Hospital and specialized in kidney transplantation. Under his leadership, the Department of Urology at Tianjin Third Central Hospital conducted kidney transplant surgeries in Tianjin. Between October 2004 and October 2006, the hospital performed 47 cases of allogeneic kidney transplants. As the Director of the Department of Urology at Tianjin Third Central Hospital, Keming Wang is highly suspected of being involved in the forced organ harvesting crimes against Falun Gong practitioners. (See Appendix [1])

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

In view of the Chinese government's ongoing persecution of Falun Gong and the defendant's participation in the persecution of Falun Gong, the plaintiff requests the court to order the defendant to pay US\$150,000 in punitive damages and to hold the defendant criminally responsible for human rights violations.

(See Appendix [2] and [3])

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/09/2024

Signature of Plaintiff

Printed Name of Plaintiff

Xiaoxia Ding

xiaoxia Ding

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Appendix [1]

Attachment [1]

Xiaoxia Ding

In July 1999, the Chinese government launched a persecution campaign against Falun Gong practitioners, a campaign that continues to this day. The government subjected Falun Gong practitioners to extremely brutal persecution, and even more horrifyingly, it engaged in "an evil that has never been seen on this planet before"—the forced organ harvesting of Falun Gong practitioners.

The defendant, Wang Keming, formerly served as the Director of the Department of Urology at Tianjin Third Central Hospital and was a member of the Tianjin Branch of the Chinese Medical Association for Organ Transplantation. He specialized in kidney transplantation. Under Wang Keming's leadership, the Department of Urology at Tianjin Third Central Hospital conducted kidney transplant surgeries in Tianjin. Between October 2004 and October 2006, the hospital performed 47 cases of allogeneic kidney transplants. Tianjin has been one of the key regions involved in the Chinese government's forced organ harvesting crimes, and as the Director of the Department of Urology at Tianjin Third Central Hospital, Wang Keming is highly suspected of being involved in these crimes.

Due to my practice of Falun Gong, I was abducted four times, sent to brainwashing centers twice, sentenced to one year of forced labor with an additional ten-month extension, and sentenced to seven years in prison. I was also dismissed from my job and endured life-threatening experiences. Although the defendant, Wang Keming, did not directly persecute me, the persecution of Falun Gong is a state-sanctioned crime, and as a part of the state apparatus, Wang Keming cannot escape responsibility.



World Organization to Investigate the Persecution of Falun Gong

To investigate the criminal conduct of all institutions, organizations, and individuals involved in the persecution of Falun Gong; to bring such investigation, no matter how long it takes, no matter how far and deep we have to search, to full closure; to exercise fundamental principles of humanity; and to restore and uphold justice in society

<https://www.upholdjustice.org/node/661>

Investigation Report on Wang Keming, Former Urology Department Director at Tianjin Third Central Hospital, Suspected of Live Organ Harvesting from Falun Gong Practitioners

Abstract: Wang Keming, male, chief physician, professor (phone: 13820847108). Formerly the director of the Urology Department at Tianjin Third Central Hospital, and a member of the Tianjin Branch of the Chinese Medical Association for Organ Transplantation. He was among the earliest in Tianjin to perform kidney transplant surgeries. In 2000, Wang Keming served as the deputy director of the Dialysis Transplant Center, mainly responsible for the nephrology work, especially kidney transplantation. After the Urology Department became independent, Wang Keming served as its director, focusing on kidney transplant. Given the broader context of the Chinese Communist Party's national crime of live organ harvesting from Falun Gong practitioners, Tianjin is one of the most severe areas involved in organ harvesting, with Tianjin First Central Hospital being the unit most involved in promoting and conducting organ transplants nationwide. In the same regional and systemic context, Tianjin Third Central Hospital is implicated, making Wang Keming, as director of the Urology Department, a person of interest in these allegations.

Wang Keming, male, chief physician, professor, was the director of the Urology Department at Tianjin Third Central Hospital, and a member of the Tianjin Branch of the Chinese Medical Association for Organ Transplantation. He specializes in kidney transplantation and was among the first in Tianjin to perform kidney transplant surgeries. Tianjin Third Central Hospital, originally named Tianjin Hedong Hospital, is a comprehensive tertiary first-class hospital integrating medical treatment, teaching, research, and prevention.



1. In 2000, Wang Keming served as the deputy director of the Dialysis Transplant Center, primarily responsible for the nephrology work, particularly kidney transplantation.

The Dialysis Transplant Center is a municipal high-tech base. It is equipped with international advanced blood purification equipment, providing various forms of blood purification technologies, and uses continuous renal replacement therapy to rescue critically ill patients, increasing the success rate. Techniques such as hemodiafiltration, hemoperfusion, immunoabsorption, and plasma exchange are widely applied in clinical departments like ICU, hepatology, and hepatobiliary surgery.

In January 2000, the Tianjin Third Central Hospital Dialysis Transplant Center was officially established. It is a comprehensive center integrating nephrology, urology, and a blood purification center, offering integrated treatment from early kidney disease to end-stage renal disease (uremia) blood purification and kidney transplantation. Wang Keming was appointed as the deputy director, mainly responsible for the urological work, especially kidney transplantation. The urology department has 4 doctors, and the hospital has assigned a dedicated lab technician and a specialized laboratory for kidney transplantation. Under the leadership of Director Wang Keming, kidney transplant surgeries were initiated in Tianjin, and an independently researched method for simplifying fluid replenishment during the polyuric phase post-kidney transplant was developed. From October 1999 to July 2002, 395 kidney transplant donors and recipients were matched at the Tianjin Central Blood Station.



世界法轮功国际组织
World Organization to Investigate the Persecution of Falun Gong

To investigate the criminal conduct of all institutions, organizations, and individuals involved in the persecution of Falun Gong; to bring such investigation, no matter how long it takes, no matter how far and deep we have to search, to full closure; to exercise fundamental principles of humanity; and to restore and uphold justice in society

2. In 2003, after the independence of the Urology Department, Wang Keming served as the director of the Urology Department.

In October 2003, all hospital wards gradually moved into the new building, and the Urology Department became independent. Wang Keming served as the Director of the Urology Department. Under the leadership of Director Wang Keming, the Urology Department of Tianjin Third Central Hospital has been performing kidney transplant surgeries in Tianjin for nearly ten years. From October 2004 to October 2006, the hospital conducted 47 cases of allogeneic kidney transplants.

3. The number of death row inmates cannot account for the number of organ transplants in Tianjin.

According to Amnesty International's records, China's annual number of executions averaged 1,680 prisoners between 1995 and 1999. Between 2000 and 2005, the average was 1,616 per year. These figures fluctuate annually, but the overall average has remained consistent before and during the persecution of Falun Gong.

In 2007, Huang Jiefu, former Vice Minister of Health, stated that the death penalty was to be reviewed by the Supreme Court, and "in recent years, the annual number of executions has been decreasing by multiples."

In July 2018, during an interview with CCTV, Huang Jiefu mentioned that the quality of organs from executed prisoners is very poor, the requirements for organ sources are very strict, and such organs could not be obtained at the execution site.

The vast discrepancy between the number of transplant surgeries and the number of executed prisoners in Tianjin suggests that there must be other sources of organs.

4. Medical papers indicate that hospitals in Tianjin are suspected of live organ harvesting

China has no legislation on brain death nor a standard for diagnosing brain death, and there is no well-established organ donation system. Therefore, the concept of a "brain-dead donor" or "brain-death donation" barely exists.

On July 11, 2006, "People's Daily Online" published an article titled "China's First Heart Donation Transplant Successful," stating, "On July 1, 2006, China successfully implemented the 18th case of voluntary organ donation from brain-dead individuals, marking the first successful heart transplant from a brain-dead donor." Professor Chen Zhonghua told reporters that up to that point, China had successfully accepted 18 cases of voluntary organ donation from brain-dead individuals.¹

On August 22, 2014, "Tencent News" published an article "Legislative Blank on Brain Death in China, 90% of Doctors Unclear on Identification Standards": Currently, over 80 countries worldwide have included brain death in their legal definition of death, but China has no such legislation yet.²

"Journal of Tianjin Nursing" published an article in April 2008 about Tianjin First Central Hospital, stating, "From 2002 to 2006, a total of 2,195 liver transplant surgeries were completed, with 2,500 livers procured from deceased donors, all tested negative for hepatitis series, syphilis, and HIV, indicating healthy donors, with procurement performed after brain death."³ During the period from 2002 to 2006, it would be impossible for Tianjin to have so many death row inmates. Without legislation on brain death, the procurement of 2,500 livers post-brain death⁴ by Tianjin First Central Hospital during this period was illegal. The paper shows that the



number of donors exceeds the number of procurements, which in turn exceeds the number of transplants. Furthermore, whether an organ is usable is determined after opening the donor's abdomen. For livers that have already been removed, there are also "intraoperative laboratory tests" performed on site, the results of which directly determine whether to keep the liver.⁵ Although the title of the paper refers to "cadaveric livers," all livers had a warm ischemia time within 10 minutes, procurement time within 30 minutes, and cold ischemia time within 12 hours. This suggests that the "procurement after brain death" described at the beginning of the paper might involve transporting living individuals to the procurement site, leading to the donor's death during the procurement process.

5. After 1999, organ transplants in Tianjin saw explosive growth

Official data shows:

In May 1994, after returning from Japan, Shen Zhongyang, the director of Tianjin First Central Hospital, completed the first orthotopic liver transplant. In September 1998, he returned to Tianjin First Central Hospital, established the organ transplant department, and by the end of the year, performed 7 liver transplants. From 1994 to 1998, Tianjin First Central Hospital took 5 years to complete 8 liver transplants.⁶

Starting in 2000, liver and kidney transplants became routine clinical surgeries at Tianjin First Central Hospital, with transplant numbers exploding. In 1999, there were 24 liver transplants.⁷ According to North Net, which is affiliated with the Tianjin government, in the two years starting from 2000, the total number of liver transplants by Shen Zhongyang's team increased from 24 to 209; and it only took one year in 2003 to increase from 209 to 1,000.⁸

By the end of 2005, a patient's family member revealed to "Phoenix Weekly" that the transplant center had performed up to 24 liver and kidney transplants in a single day.

By the end of 2009, Tianjin First Central Hospital had completed over 3,300 liver transplant surgeries, 2,357 kidney transplant surgeries, and 31 combined pancreas-kidney transplants.⁹ According to the "China Liver Transplant Registry (CLTR)" report: by the end of 2010, the teams led by Shen Zhongyang at Tianjin First Central Hospital and the Armed Police General Hospital had completed 6,270 liver transplants.¹⁰

On December 10, 2014, "Science and Technology Daily" in mainland China reported that by December 2014, Shen Zhongyang's number of liver transplants had exceeded ten thousand.¹¹

After 2006, the annual number of liver and kidney transplants at Tianjin First Central Hospital alone reached between 5,000 to 8,000 cases.

The new building of the hospital's organ transplant center officially opened on September 1, 2006,¹² with over 500 beds.¹³ (Other reports indicate that by this time, the number of beds had already reached 700.¹⁴)

Bed occupancy rate: 90-131.1%.¹⁵ (The average bed occupancy rate for tertiary hospitals in China in 2013 was 103%¹⁶)

The average hospital stay for liver transplants: 25-30 days (the average hospital stay for kidney transplants in China is 30 days). Based on the number of beds and turnover rate, the hospital's actual number of liver transplant surgeries per year exceeds 5,000, with a peak reaching 8,000 per year.



World Organization to Investigate the Persecution of Falun Gong

To investigate the criminal conduct of all institutions, organizations, and individuals involved in the persecution of Falun Gong; to bring such investigation, no matter how long it takes, no matter how far and deep we have to search, to full closure; to exercise fundamental principles of humanity; and to restore and uphold justice in society

The annual transplant surgery volume is calculated as follows:

Annual transplant volume: 5,475 cases (500 beds \times 365 days \times 90% occupancy / 30 days), calculated at a 90% bed occupancy rate with a 30-day hospital stay.

Annual transplant volume: 7,975 cases (500 beds \times 365 days \times 131.1% occupancy / 30 days), calculated at a 131.1% bed occupancy rate with a 30-day hospital stay.

Annual transplant volume: 8,544 cases (500 beds \times 365 days \times 131.1% occupancy / 28 days), calculated at a 131.1% bed occupancy rate with a 28-day hospital stay.

Each year, the actual number of surgeries exceeds 5,000, with peak periods reaching 8,000 per year.

6. Telephone Investigation Reveals: The Main Source of Organs for Transplants in Tianjin City is Falun Gong Practitioners

Based on reports from Chinese Communist Party's media and publicly disclosed information from the transplant center's website, the high number of transplants at "Tianjin First Central" raises questions about the CCP's explanation of organ sources. Without a donation system, the organs used for transplants at the hospitals are certainly not all from death row inmates. The main source of organs for transplants in Tianjin City is Falun Gong practitioners.

In 2006, a kidney transplant director and in 2018, an assistant to Director Shen, admitted to using organs from Falun Gong practitioners.

Examples from telephone investigations: In 2006, the transplant director, and in 2018, the assistant to the hospital director, both admitted to using organs from Falun Gong practitioners.

Subject of Investigation: Bai Rongsheng, liver transplant doctor and assistant to Director Shen Zhongyang at Tianjin First Central Hospital¹⁷

Date of Investigation: November 15, 2018 (+86-13803019898)

Summary of Content:

Investigator: The liver sources, the donors are generally quite healthy, right? The healthy ones from Falun Gong, right?

Bai Rongsheng: Right, right, yes.

(Audio 1 playback and [MP3](#) download, full transcript available in [pdf 10](#))

Personal Profile: Bai Rongsheng is an assistant to Shen Zhongyang, as well as a liver transplant surgeon. Shen Zhongyang is the director of the Liver Transplantation Research Institute of the Third Medical Center of the People's Liberation Army General Hospital (formerly the Armed Police Force General Hospital), the director of the Oriental Organ Transplantation Center (Tianjin), chief physician, professor and PhD students' supervisor.¹⁸



World Organization to Investigate the Persecution of Falun Gong #11

To investigate the criminal conduct of all institutions, organizations, and individuals involved in the persecution of Falun Gong; to bring such investigation, no matter how long it takes, no matter how far and deep we have to search, to full closure; to exercise fundamental principles of humanity; and to restore and uphold justice in society

Subject of Investigation: Song Wenli, Director of Kidney Transplants at Tianjin First Central Hospital¹⁹

Date of Investigation: March 15, 2006 (+86-13920128990)

Summary of Content:

Investigator: Is this Director Song from Tianjin First Central Hospital?

Song Wenli: Ah, go ahead!

Investigator: ...His doctor told him the kidney source is quite good, he practices qigong. When asked what kind of qigong, he said Falun Gong, you know people who practice Falun Gong are generally in good health~ [interjected by the other party]

Song Wenli: Of course! We have such cases here too. We also have what are called donors with breathing or heartbeat, we have had, this year up to now, probably about a dozen such kidneys.

(Audio 2 playback and [MP3](#) download, transcript available in PDF [Addendum](#))

Brief Introduction to Song Wenli: Director of Kidney Transplants at Tianjin First Central Hospital Organ Transplant Center, member of the Chinese Medical Association Organ Transplantation Branch, member of the Tianjin Medical Association Organ Transplantation Branch, completed approximately over 2,000 kidney transplants.²⁰

Reference

¹People.com: China's Success in First Heart Donation Transplant-- the donor was the 18th brain-dead organ donor in China" July 11, 2006

Link to WOIPFG Files:

<http://www.zhuichaguoji.org/cn/images/medicalarticles/22.png>

² Tencent.com News: China's Brain Death Legislation Blank 90% of Doctors Don't Know the Identification Standards August 22, 2014

Link to WOIPFG Files:

<http://www.zhuichaguoji.org/cn/images/medicalarticles/10.png>

³ Gao, Ying and Liu Yanying. "Surgical Cooperation for Cadaveric Liver Extraction in Orthotopic Liver transplantation" *Tianjin Journal of Nursing*. April 2008, Vol. 16, Issue No. 2. WOIPFG archived link: <http://www.zhuichaguoji.org/cn/images/medicalarticles/160.pdf>

⁴ WOIPFG. "Evidence of Live Organ Harvesting of Falun Gong Practitioners Collected from Chinese Medical Papers". October 13, 2014 first published, January 2, 2016 updated. <http://www.upholdjustice.org/node/263>

⁵ Gao, Ying and Liu Yanying. "Surgical Cooperation for Cadaveric Liver Extraction in Orthotopic Liver transplantation" *Tianjin Journal of Nursing*. April 2008, Vol. 16, Issue No. 2. WOIPFG archived link: <http://www.zhuichaguoji.org/cn/images/medicalarticles/160.pdf>

- ⁶ Baike. "Organ transplant tourism." WOIPFG archived webpage: <http://www.zhuichaguoji.org/cn/images/nationalcriminalreports/17.png> (December 24, 2015)
- ⁷ People.com.cn. "He brought liver transplantation technologies to the pinnacle of world medicine". December 8, 2014. <https://drive.google.com/file/d/0ByxwXcZIX2dXQzhJbi1HUXhheXZWU09hTlc3N3g1ZiZvRVZj/view> Archived webpage: <http://archive.is/jOh1m>
- ⁸ ENorth Netnews. "Tianjin First Central Hospital Becomes the World's Largest Liver Transplant Center." November 29, 2004. Archived webpage: <http://web.archive.org/web/20190515053549/http://www.hbver.com/Article/gyhjqt/gyz/200411/3326.html> (May 15, 2019)
- ⁹ www.transplantation.org.cn. "Brief Introduction to the Organ Transplant Center of Tianjin First Central Hospital." <http://www.transplantation.org.cn/ZTianJinDiYiZhongXinYiYuanKuaiXun/2010-06/4581.htm> Archived Webpage: <http://web.archive.org/web/20120419071050/http://www.transplantation.org.cn/ZTianJinDiYiZhongXinYiYuanKuaiXun/2010-06/4581.htm> (April 19, 2012)
- ¹⁰ Tianjin First Central Hospital. "Profile of Shen Zhongyang". <http://www.tj-fch.com/jiuyi/expertInfo.aspx?id=247>
- ¹¹ Wu, Yuehong, Luo Chaoshu, Li Ying and Feng Guowu. "Promoting the Legislation of Voluntary Organ Donation - Professor Shen Zhongyang, President of Tianjin First Central Hospital (III)". *Science and Technology Daily*. December 10, 2014. WOIPFG archived webpage: <http://www.zhuichaguoji.org/cn/images/nationalcriminalreports/432.png>
- ¹² Xu Yang. (2006, Sep. 2). Orient Organ Transplant Center was put to Use yesterday. *Tianjin Daily*. Retrieved from: <http://news.sohu.com/20060902/n245125745.shtml>
WOIPFG archived link: <http://www.zhuichaguoji.org/cn/images/nationalcriminalreports/503.png>
- ¹³ Memorabilia of the Tianjin First Central Hospital. Retrieved from: <http://www.tj-fch.com/sitecn/dsj/1591.html>
WOIPFG archived link: <http://www.zhuichaguoji.org/cn/images/nationalcriminalreports/522.png>
- ¹⁴ "Famous doctors of Jinmen". "Striving hard in the past and rebuilding the glory today - Professor Shen Zhongyang, a famous transplant specialist". <https://web.archive.org/web/20190625031411/http://www.cccm-em120.com/zhongxiyiguokan/cccm/pdf/2006-2/1%E6%98%94%E6%97%A5%E6%8B%BC%E6%90%8F%E8%BF%9B%E5%8F%96%20%E4%BB%8A%E6%97%A5%E9%87%8D%E5%BB%BA%E8%BE%89%E7%85%8C%E2%80%94%E2%80%94%E8%91%97%E5%90%8D%E7%A7%BB%E6%A4%8D%E5%AD%A6%E4%B8%93%E5%AE%B6%E6%B2%88%E4%B8%AD%E9%98%B3%E6%95%99%E6%8E%88.pdf>
WOIPFG International's Investigation Report on the CCP's Crime of Harvesting a Large Number of Live Falun Gong Practitioners (Summary). Last modified October 13, 2019. https://www.zhuichaguoji.org/node/124628#_ch1
- ¹⁵ Qu Lulin. (2014, Jun. 25). Tianjin First Central Hospital. Retrieved from: <http://www.sjtu.edu.cn/zdh/zzjg/fsyy.htm>
WOIPFG archived link: <http://www.zhuichaguoji.org/cn/images/nationalcriminalreports/497.png>
- ¹⁶ (2014, Dec. 27). Liu Guoen: the reform of public hospitals had great potential. *China's non-public medical institutions Association*.
- ¹⁷ WOIPFG. "A WOIPFG Investigation Report on the Chinese Communist Party's Ongoing Crime of Live Organ Harvesting against Falun Dafa Practitioners (VI)". December 2, 2018. <http://www.upholdjustice.org/node/404>
- ¹⁸ Medical Literature Database of the Third Medical Center of the People's Liberation Army General Hospital (formerly the Armed Police General Hospital). <http://www.wj-hospital.com/yjshzx1/yz/>
WOIPFG archived link: <http://www.zhuichaguoji.org/media/2019/0712/SC35.pdf>
- ¹⁹ WOIPFG. "Collection of Evidence of Live Organ Harvesting from Falun Gong Practitioners by the Chinese Communist Party". September 11, 2013. <http://www.upholdjustice.org/node/241>
- ²⁰ Song Wenli, Liver Transplant Surgery, Tianji First Central Hospital. Archived webpage: <http://web.archive.org/web/20160123052832/http://www.guahao.com/expert/0db3c13d-ef80-4901-a234-512ae0f7b466000?hospDeptId=b55dd752-651b-4e06-88b6-bf61d43ba3ec000&hospitalId=c6b99af3-7ac3-403c-bc5c-346fd03d358e000> (January 23, 2016)